

[Parties and Counsel Listed on Signature Pages]

UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF CALIFORNIA

IN RE: SOCIAL MEDIA ADOLESCENT  
ADDICTION/PERSONAL INJURY PRODUCTS  
LIABILITY LITIGATION

This Document Relates To:

ALL ACTIONS

MDL No. 3047

Case No. 4:22-md-03047-YGR (PHK)

**JOINT STATUS REPORT ON  
DISCOVERY FOR NOVEMBER 21, 2024  
DISCOVERY MANAGEMENT  
CONFERENCE**

Judge: Hon. Yvonne Gonzalez Rogers

Magistrate Judge: Hon. Peter H. Kang

Pursuant to Discovery Management Order (“DMO”) No. 2 (ECF 606), the Personal Injury (“PI”) and School District and Local Government Entity (“SD”) Plaintiffs, State Attorneys General (“State AGs”), and Defendants submit this agenda and joint statement in advance of the November 21, 2024, Discovery Management Conference (“DMC”).

## **I. Agenda**

### **A. State AG/Agency Discovery Reports**

1. Litigation Hold Report
2. Joint Plan re Rolling Productions, Substantial Completion, and Depositions

### **B. Meta v. AG Disputes<sup>1</sup>**

1. Dispute between Meta and Missouri AG regarding State Agency Discovery (parties still conferring and anticipate filing joint letter brief (“JLB”))
2. Dispute between Meta and New York AG regarding State Agency Discovery (parties still conferring and JLB may be forthcoming)
3. Dispute between Meta and Rhode Island AG regarding State Agency Discovery (parties still conferring and JLB may be forthcoming)
4. Anticipated disputes between Meta and other AGs regarding State Agency Discovery (parties still conferring and JLBs may be forthcoming)

### **C. Meta v. PI/SD Disputes**

1. Dispute between PI/SD Plaintiffs and Meta Defendants concerning RFPs 317, 325, 335, 344-346, and 357 (ECF No. 1316)
2. Dispute concerning PI/SD Plaintiffs’ Requests For Compensation Documentation for Subset of Meta Deponents (ECF No. 1318)

---

<sup>1</sup> With the exception of the Missouri AG, no other State AG agrees that the procedures in the Standing Order have been fulfilled such that letter briefing is appropriate in advance of the DMC and that any disputes regarding state agency discovery are ripe for resolution.

**D. YouTube v. PI/SD Disputes**

1. Dispute concerning Request for Production (“RFP”) Nos. 62, 69, 71, 72, 76, 79 related to YouTube’s corporate structure, compensation incentives, and user complaint process (ECF No. 1305)
2. Dispute concerning RFP Set A No. 7 (JLB forthcoming)
3. Dispute concerning RFP Nos. 126 and 127 (JLB forthcoming)

**E. Defendants v. PI Bellwether Disputes**

1. Dispute between PI Bellwether Plaintiffs and Defendants concerning permissible scope of questions at depositions of Bellwether Plaintiffs (JLB forthcoming)
2. Dispute concerning Defendants’ request to depose expert regarding factory reset of device of certain Bellwether Plaintiff (JLB forthcoming)

**II. Court-Ordered Updates/Reports****A. PI/SD RFP Nos. 16 and 18 to Google LLC and YouTube, LLC (ECF 1294)**

The parties report that the Plaintiffs have identified custodians and the parties continue to meet and confer and discuss this process cooperatively.

**B. PI/SD Interrogatory No. 1 to Snap Regarding Production of Hip Chat Information**

On November 8, 2024, Snap informed Plaintiffs that it was unable to locate Hip Chat information produced in *In re Snap Inc. Securities Litigation*, but it did locate two USB devices from 2017 that may contain Hip Chat information produced in another matter. Snap’s expert was unable to access the devices, but Snap has provided the devices to Plaintiffs’ expert for inspection. At the October 24, 2024 DMC, Snap also indicated it was reviewing Hip Chat information produced to the Department of Justice in a prior matter. Snap is finalizing its review of these messages and will produce any responsive messages identified in that review in the coming weeks.

**C. SD Plaintiffs’ RFPs (Set A) to Meta**

In DMO 11, the Court requested an update regarding “the status of [Meta’s] investigation as to custodians and the status of [the] document production” relating to the School Districts’ RFPs (Set A) to Meta, as ordered by the Court. ECF 1320 at 7. Consistent with the Court’s guidance, Meta is reviewing organizational information and making inquiries of certain employees for purposes of determining

whether any of its existing custodians have worked on Meta partnerships in the education space and/or had interactions with educators, or have worked with D.G. or L.C. on education-related matters. Meta will also promptly run the SD Bellwether Plaintiffs' search terms over the custodial files of D.G. and L.C. and the non-custodial files as directed by the Court.

**D. Meta and State AG Proposed Plans Regarding Rolling Productions, Substantial Completion, and Depositions**

The parties propose the following plans for the completion of substantial document production by the State AGs/Agencies and depositions.

| Event <sup>2</sup>  | State AGs' Proposed Date | Meta's Proposed Date   |
|---|--------------------------|--|
| Completion of conferrals regarding Rule 34 state agency discovery                                 | November 22, 2024        | November 22, 2024, provided that briefing on any disputes shall be submitted by December 6, 2024 |
| Deadline for rolling productions of state agency documents pursuant to Rule 34 discovery to begin | December 10, 2024        | November 30, 2024 (DMO 11)   |
| Deadline for 30(b)(6) subpoenas or notices to the State AGs/state agencies                        | January 15, 2025         | December 15, 2024  |
| Substantial completion of State AG and state agency documents pursuant to Rule 34 discovery       | February 14, 2025        | December 31, 2024 (DMO 11)   |
| 30(b)(6) depositions  | March 14-April 14, 2025  | January 30–February 28, 2025   |

<sup>2</sup> The parties dispute whether these deadlines apply to state agencies that have received Rule 45 subpoenas. The parties also have various deposition-related disputes regarding all State AGs and state agencies, including the proper entity to be noticed or subpoenaed for 30(b)(6) depositions, whether depositions of state agency personnel must be noticed or subpoenaed, the number of deposition hours Meta may take of State AG and state agency personnel, and the propriety of any such depositions. The parties reserve all rights with respect to these disputes.

| Event   | State AGs' Proposed Date | Meta's Proposed Date   |
|---|--------------------------|------------------------|
| Deadline for subpoenas or notices for the State AG and state agency fact depositions      | April 14, 2025           | March 7, 2025          |
| Deadline for Meta to complete fact depositions of the State AG and state agency witnesses | May 16, 2025             | April 4, 2025 (CMO 18) |

### **State AGs' Position:**

The State AGs' proposed plan permits discovery on state agencies to move forward expeditiously and efficiently. The plan takes into consideration the resource constraints that state agencies face in fulfilling their duties to serve their communities while also responding to Meta's overbroad and unduly burdensome discovery requests. This is especially true with respect to the numerous agencies that the State AGs have determined to be unlikely to have *any* responsive documents, or for which searches and production of documents are not proportional to the needs of the case. Meta has forced State AG and agency counsel to engage in extensive, cumbersome conferrals, and still has refused to exclude many of these agencies from its discovery requests. Instead, Meta has largely declined to consider any targeted or "go get 'em" searches, and instead insisted on extremely expansive search terms, such as "mental health" combined with a "youth" term, which in some instances may encompass all or most of an agency's documents. For example, Meta has sought to force child welfare agencies to divert their limited resources from aiding vulnerable children to searching for the proverbial needle in the haystack, where the needle is a document of marginal relevance that may not even exist, and the haystack is comprised of millions of sensitive documents and communications regarding those children. Indeed, despite many state AGs opting into Meta's search term and custodian timeline, Meta has thus far failed to reach agreement with *any* State AG on search terms. Meta's objectively unreasonable positions on these issues have created needless delay in document productions.

The State AGs thus propose a modest extension of the deadlines to begin rolling productions of state agency documents and to substantially complete those productions. These proposed dates will allow for full negotiations of the feasibility of search term proposals and of any objections based on burden and proportionality, which may vary among the agencies. The State AGs also propose a commensurate

1 extension, beyond Meta's proposed dates, for Meta to take depositions of state agencies. Though the State  
2 AGs reserve all rights related to the propriety of and hours limits for those depositions, the proposed  
3 deadlines will allow Meta sufficient time to prepare for and take any depositions that are ultimately  
4 permitted to occur. The Court recently endorsed a stipulation between Defendants (including Meta) and  
5 the School District Bellwether Plaintiffs to similarly extend the time to take depositions to mid-May. *See*  
6 ECF No. 1249.

7 To be clear, the State AGs' proposal depends on both sides working together to make these dates  
8 possible, including Meta's fulsome participation in discussions surrounding scope, proportionality,  
9 relevance and burden of its requests and proposals. Also, the State AGs' proposal does not encompass  
10 agencies that have received Rule 45 subpoenas nor does it include state agencies or State AGs from  
11 Maryland, Idaho, or West Virginia, who have only pled COPPA claims and for which Meta has  
12 rescinded its current discovery requests. Also, certain State AGs do not join in this discovery plan  
13 proposal at this time with respect to party discovery of documents possessed by a modest number of  
14 state agencies who have not received Rule 45 subpoenas. Those agencies include: Arizona Office of  
15 Strategic Planning and Budgeting, Colorado Office of the Governor, Colorado Office of Economic  
16 Development and International Trade, Colorado Office of Strategic Planning and Budgeting, all relevant  
17 California agencies, all relevant Georgia agencies, all relevant Michigan agencies, all relevant  
18 Pennsylvania agencies, and the South Carolina Office of the Governor. The State AGs may update this  
19 list at the November 21 DMC.

20 To the extent that the State AGs disagree with Meta's recitation below of the status of conferrals  
21 on state agency search terms and custodians, the State AGs respond as follows:

22 **Arizona:** The Arizona State AG, along with outside agency counsel, has met and conferred with  
23 Meta one time since the October DMC, on November 7. Of six Arizona agencies at issue, two have  
24 proposed search terms and custodians to Meta, one has been "deprioritized" by Meta, and the three other  
25 state agencies, all having received Rule 45 subpoenas, agreed to propose to Meta search terms and  
26 custodians and consider those terms proposed to the agencies by Meta on November 8. Despite ongoing  
27 negotiations, Meta has, at various times, declared an impasse and requested H.2 conferrals, including  
28 attempts on November 5 and November 6 to pre-emptively characterize our first and only conferral on

1 November 7 as an H.2. Additionally on November 6, Meta requested that the Arizona State AG  
2 schedule an H.2 conference on November 11 (a state holiday) or November 12, on the assumption that  
3 we would be unable to resolve as-yet-undiscussed “issues” the following day. On the night of November  
4 11, a holiday and just one full business day after our lone meet and confer wherein the Arizona AGO  
5 and all Arizona agencies reached agreements relating to the exchange of search terms and custodians,  
6 Meta again unilaterally declared the “need” for an H.2 on November 12 or 13, and again declared an  
7 impasse (including on issues raised after the parties’ meet and confer) on November 12 via email.

8 **California:** The California State AG has facilitated two meet and confers between Meta and  
9 counsel for 12 of the California state agencies at issue and has exchanged significant correspondence  
10 with Meta since the October DMC. While reserving their rights with regard to the pending interim order  
11 from the District Court, the three state agencies under the Governor’s Office that have received Rule 45  
12 subpoenas and have not been “deprioritized” by Meta recently agreed to propose search terms and  
13 custodians for document production. Despite these ongoing negotiations, Meta declared an impasse and  
14 requested an H.2 conferral on November 5, prior to the initial meet and confer that took place November  
15 8. The eight state agencies that have not received Rule 45 subpoenas are continuing to take the position  
16 that they will not give the California State AG access to their documents for purposes of party discovery  
17 in this action. The California AG has repeatedly offered to facilitate Meta’s service of Rule 45  
18 subpoenas to those agencies to expedite document production, but Meta has refused.

19 **Delaware:** The Delaware State AG has had a number of communications with Meta and met and  
20 conferred with Meta once since the October DMC. It is scheduled to meet and confer with Meta again  
21 on Tuesday, November 19. The State AG or respective state agencies have proposed search terms and  
22 custodians for the 2 agencies that did not receive Rule 45 subpoenas. Despite these ongoing  
23 negotiations, Meta has declared an impasse and requested an H.2 conferral on November 11, just one  
24 business day after Meta provided its initial search term proposal.

25 **Georgia:** The Georgia AG is currently negotiating with Meta on the terms of a stipulation of  
26 dismissal of the Georgia AG’s complaint.

27 **Minnesota:** On November 1, the five Minnesota agencies that did not receive subpoenas  
28

1 provided a search term and custodian proposal. Specifically, two agencies proposed targeted search  
2 terms and custodians (one agency's custodian proposal will be provided next Wednesday), and the other  
3 three explained that after conducting a reasonable search, they had minimal responsive documents  
4 (which are being produced) and otherwise have no custodians likely to have any responsive documents.  
5 For the three subpoenaed agencies, consistent with Judge Gonzalez Rogers Order (Doc 1292), we asked  
6 Meta to resume the Rule 45 process but Meta refuses to do so. Nonetheless, these agencies are fulfilling  
7 their Rule 45 obligations and have already produced more than 13,500 documents totaling over 90,000  
8 pages. Meta met with the MN AGO on November 8 for the first time, during which Meta conceded that  
9 it had taken no steps to resume the Rule 45 process. Meta then sent a counter search term proposal on  
10 November 11, which we are reviewing and preparing a counter-proposal. Despite these ongoing  
11 negotiations, Meta unilaterally declared an impasse and prematurely requested an H.2 conferral.

12 **New York:** The New York Office of the Attorney General ("OAG") has met and conferred with  
13 Meta three times by videoconference since the October DMC. In addition, Meta exchanged a series of  
14 emails with outside counsel to the Office of the New York Governor and that counsel joined two of the  
15 videoconferences. On November 1, OAG provided a list of search terms and custodians for one agency,  
16 the Education Department, not represented by outside counsel for the Governor. Meta provided an  
17 alternate set of more than 300 individual search terms. OAG is waiting for electronic downloads to test  
18 the alternate search terms. OAG also provided Meta with information that two agencies were unlikely to  
19 have responsive documents. For the remaining agencies OAG proposed bringing the same terms it  
20 suggested for the Education Department back to the other agencies and outside counsel. In response  
21 Meta provided a similarly broad set of search terms. These have all been presented to outside counsel for  
22 the Governor. Despite these ongoing negotiations, Meta has declared an impasse and the parties held an  
23 H.2 conference on Wednesday, November 13.

24 **Ohio:** The Ohio AG has met and conferred with Meta two times since the October DMC and are  
25 scheduled to meet again Nov. 19, 2024. The Ohio AG or respective state agencies have agreed to  
26 provide search terms and custodians for all agencies at issue and provided its response to Meta's first  
27 search term proposal on November 15, 2024. Despite these ongoing negotiations, Meta declared an  
28 impasse and requested an H.2 conferral. However, no H.2 conferral has yet occurred due to there being



1 no ripe discovery dispute.

2 **Pennsylvania:** The Pennsylvania State AG has met and conferred with Meta 2 times since the  
3 October DMC. The Pennsylvania State AG has also attempted to contact Meta 1 times without a  
4 response. The State AG or respective state agencies are working with Meta on search terms and  
5 custodians for 5 agencies. Despite these ongoing negotiations, Meta has declared an impasse and  
6 requested an H.2 conferral despite our agencies ongoing willingness to work with them.

7 **Rhode Island:** The Rhode Island Office of the Attorney General has conferred with Meta twice  
8 since the October DMC and has also exchanged substantial correspondence. Three agencies, including  
9 two who have Rule 45 subpoenas, have identified custodians that are likely to have relevant documents  
10 responsive to Meta's Requests for Production. The RIAG and these agencies have proposed 31 total  
11 custodians and are in the process of negotiating search terms with Meta. Counsel for the remaining  
12 agencies have represented that those agencies do not have proposed custodians and the RIAG is  
13 following up with those agencies to obtain information regarding how they made that determination. On  
14 Sunday, November 10th Meta requested an H.2 conferral. That H.2 conferral is tentatively scheduled  
15 for Monday, November 18th at 9AM ET although the RIAG has agreed to each of Meta's demands they  
16 have made in connection with the H.2 conferral and there does not appear to be any actionable dispute.

17 **Meta's Position:**

18 Unlike the States' proposal, Meta' proposal seeks to accomplish what this Court directed the  
19 parties do in DMO 11: to (i) "start rolling [state agency] productions by the end of November 2024"; (ii)  
20 "complete substantial production of documents from the agencies and the State AGs by the end of  
21 December 2024"; and (ii) identify, serve, schedule, and resolve disputes over depositions "before the  
22 fact discovery cutoff"—April 4, 2025. ECF No. 1299; *see also* ECF No. 1290 (CMO 18, setting fact  
23 discovery cutoff).

24 Meta's proposed schedule reflects the overall case schedule entered by the Court that the States  
25 agreed to months ago. The States now must live with their decision to, on the one hand, push  
26 aggressively to secure a trial date that facilitates inclusion among the first set of trials in this litigation  
27 while, on the other hand, resist aggressively for nearly a year now against Meta's efforts to obtain  
28 meaningful discovery from the States and their agencies. Indeed, even after this Court largely granted

1 Meta's motion to compel state agency discovery through the States, ECF No. 1117, the States continued  
2 to resist Meta's efforts to advance such discovery. For example, most recently, some States seek to  
3 exclude subpoenaed agencies (who mostly had not produced any documents) from this Court's orders  
4 requiring a search term and custodian process (ECF Nos. 1291, 1299), and/or refused to schedule H.2  
5 conferrals on their non-compliance with those Court orders to prevent letter briefs from being submitted  
6 by the November DMC as this Court contemplated. *See* ECF No. 1291; 10/25/24 DMC Hr'g Tr. at  
7 137:6-12 ("[I]f there is a dispute [over search terms], it's going to be -- that gives you time to tee it up in  
8 the next DMC statement, and we'll talk about it at the next DMC.").

9 The States' attempt to point the finger back at Meta paints with too broad a brush. For example,  
10 Meta has agreed to narrow or even forgo search terms and custodians for many state agencies, including  
11 by asking child welfare agencies to propose custodians who are not working on individual child welfare  
12 cases to avoid collection of "millions of sensitive documents and communications regarding" those  
13 cases, focusing other agencies on "go get 'em" requests, or even de-prioritizing certain agencies  
14 completely, as appropriate. Meta also has asked agencies to disclose their prior search efforts to assess  
15 whether a more tailored process can be crafted for individual agencies. And as for the search terms  
16 Meta proposed (in many instances to advance the ball because the States had proposed no terms), some  
17 States are open to running them, and Meta has invited the States to propose suggested edits for Meta's  
18 consideration if they wish to do so (which at least one has done, and others have promised to do).  
19 Indeed, the States' general complaint about the breadth of Meta's terms is largely unsubstantiated; the  
20 vast majority of States have not even provided any hit reports for any set of proposed terms, despite  
21 Meta's requests.

22 The States point to a recent School District Bellwether extension stipulation as a basis for their  
23 mid-May deposition deadline. But that extension was part of a stipulated resolution of the most  
24 significant then-pending discovery dispute (which was over search terms). Here, however, as reflected  
25 in both the Joint Plan's footnote and the parties' position statements, significant disagreements still  
26 remain about how discovery will proceed, including over who will use search terms, what search terms  
27 to use, what custodians to use, whether and which state agencies need to be separately noticed or  
28

subpoenaed for 30(b)(6) depositions, the length of any depositions, and other issues. Moreover, the number of States with whom these disputes will need to be resolved, and from whom discovery would need to be obtained from them and their agencies, significantly outnumbers the School District Bellwether Plaintiffs. And unlike the School District Bellwether cases where Defendants' burden can be spread across different parties, Meta exclusively bears the burden in the State cases. Accordingly, the stipulation in the School District Bellwether cases is not an appropriate measure for this case

Meta should not be prejudiced by the States' own discovery-related delays. Among other things, under the States' proposed schedule, the States would not substantially complete document productions until three months after Meta has done so, and the bulk of the States' 30(b)(6) depositions would have to be conducted during the already busy final weeks immediately prior to the April 4, 2024 fact discovery deadline for other Plaintiffs. The deadline for completing the States' depositions also would not occur until their expert reports are due. *See* ECF No. 1290 (setting May 16 and 19, 2025 expert report deadlines). If the States need more time to provide the discovery to which Meta is entitled, that should come with corresponding extensions of other deadlines in this case, including the States' trial date.

As of today, the following reflects the status of the parties' conferrals on state agency custodians and search terms.<sup>3</sup>

1. "Holdout" States referenced as such in ECF No. 1299 (Arizona, California, Colorado, Delaware, Illinois, Kentucky, Maryland, Michigan, Minnesota, Missouri, New

---

<sup>3</sup> Less than two hours before the DMC Statement was due, Arizona, California, Delaware, Minnesota, New York, Ohio, Pennsylvania, and Rhode Island shared for the first time lengthy purported state-specific conferral updates. Meta disagrees with many of the characterizations contained in those purported updates, especially as they relate to the parties' negotiation history, and will be ready to provide more details at the DMC should the Court request it. Additionally, Meta notes that with the exception of Ohio, each of those States were under Court order to propose search terms and custodians for all agencies covered by ECF No. 1117 by November 1, 2024 (*see* ECF No. 1291 and 1299), and did not do so.

York, Oregon, Pennsylvania, and Rhode Island):

- a) Will submit joint letter briefing: Missouri, New York
- b) Did not propose search terms and custodians for all agencies by November 1, 2024, have not committed to any date by which such terms and custodians will be provided for substantially all agencies, and have not agreed to schedule an H.2 conferral to occur on or before today's date on this issue, so that joint letter briefing can be submitted before the November DMC, despite Meta's requests: Arizona, California, Delaware, Minnesota, Pennsylvania, Rhode Island
- c) Proposed search terms and custodians—or have committed to do so by a date certain—for a meaningful number of agencies and are undertaking further meet-and-confer efforts: Colorado, Illinois, Kentucky, Michigan, Oregon
- d) Have only alleged COPPA claims and will receive new discovery requests from Meta: Maryland

2. Opt-In States at the time ECF No. 1299 was entered (Connecticut, Florida, Georgia, Hawaii, Idaho, Indiana, Kansas, Louisiana, Maine, Montana, Nebraska, New Jersey, North Carolina, Ohio, South Carolina, South Dakota, Virginia, Washington, West Virginia, and Wisconsin):

- a) Have not proposed search terms and custodians for a meaningful number of agencies, and have not agreed to schedule an H.2 conferral requested by Meta: Georgia, Ohio
- b) Proposed search terms and custodians for some agencies and are undertaking further meet-and-confer efforts: Connecticut, Hawaii, Indiana, Kansas, Louisiana, Maine, Montana, Nebraska, New Jersey, North Carolina, South Carolina, Wisconsin

c) Have agreed to a search term and custodian process in the abstract and are undertaking further meet and confer efforts: Florida, South Dakota, Virginia, Washington

d) Have only alleged COPPA claims and will receive new discovery requests from Meta: Idaho, West Virginia

### **III. Unripe Disputes**

#### **A. Meta and Snap Defendants v. Plaintiffs**

1. Source Code Protective Order

#### **B. Defendants v. PI Bellwether Plaintiffs**

1. Scheduling of depositions
2. Depositions of witnesses identified on PI Plaintiffs' initial disclosure lists
3. RFPs held in abeyance by JCCP plaintiffs
4. Responses/updates to PI Bellwether Common Interrogatories Nos. 1-2
5. Amendment of initial disclosures
6. Process for third parties M.S. and R.T. to search for and produce responsive documents
7. Proposed Rule 45 subpoena to Microsoft for a PI Bellwether's GroupMe account

#### **C. Defendants v. SD Bellwether Disputes**

1. Dekalb, Jordan, and St. Charles District-specific RFPs
2. Tucson District-specific search terms
3. Baltimore custodians

#### **D. Meta v. PI/SD and/or AG Plaintiffs**

1. Production of interrogatory responses produced in other AG litigations
2. Responses to PI/SD Interrogatories Nos. 1-2
3. Length of depositions of certain Meta executives
4. Relevant time period (JCCP)

5. Dispute between SD Plaintiffs and Meta concerning RFP Nos. 5, 6, and 9 from Set A
6. Dispute between SD Plaintiffs and Meta concerning RFP No. 3 from Set A and “go get” or structured data requests

#### **E. Meta v. State AGs**

1. Limits on Meta’s depositions of State AGs and state agencies
2. Failure by the following State AGs to schedule H.2 conferrals requested by Meta to occur on or before today, so that joint letter briefing can be submitted before the November DMC, on the State AGs’ failure to propose search terms and custodians by the November 1, 2024 deadline set by this Court: Arizona, California, Delaware, Georgia, Illinois, Minnesota, Pennsylvania
3. Disputes concerning various RFPs State AGs served on Meta

#### **F. YouTube v. PI/SD Plaintiffs**

1. Non-Custodial Sources [ECF 1246]
2. RFP Set 3 [Nos. 37, 50]
3. RFP Set 4 [No. 56]
4. RFP Set 5 [pending confirmation letter]
5. RFP Set 6 [Nos. 103-109, 111-112]
6. RFP Set 8 [pending confirmation letter]
7. RFP Set 10 [search terms and time period]
8. Deponent-specific document productions

#### **G. Tik Tok v. PI/SD Plaintiffs**

1. Production of Recalled Lark Chats
2. TikTok’s privilege logs and metadata relating to privilege assertions
3. TikTok’s production issues, including issues related to ApachePOI
4. SD RFP Set A
5. RFP 295, 296 and 282 (Foreign Investigations)

**H. Snap v. PI/SD Plaintiffs**

1. Snap's production of employee communications by Snap
2. Production of personnel files for deponents
3. Production of Hip Chat information produced in other litigations
4. PI/SD Plaintiffs' challenges to Snap's privilege redactions

Respectfully submitted,

DATED: November 15, 2024

By: /s/ Previn Warren

LEXI J. HAZAM  
**LIEFF CABRASER HEIMANN &  
BERNSTEIN, LLP**  
275 BATTERY STREET, 29TH FLOOR  
SAN FRANCISCO, CA 94111-3339  
Telephone: 415-956-1000  
lhazam@lchb.com

PREVIN WARREN  
**MOTLEY RICE LLC**  
401 9th Street NW Suite 630  
Washington DC 20004  
Telephone: 202-386-9610  
pwarren@motleyrice.com

Co-Lead Counsel

CHRISTOPHER A. SEEGER  
**SEEGER WEISS, LLP**  
55 CHALLENGER ROAD, 6TH FLOOR  
RIDGEFIELD PARK, NJ 07660  
Telephone: 973-639-9100  
cseeger@seegerweiss.com

Counsel to Co-Lead Counsel

JENNIE LEE ANDERSON  
**ANDRUS ANDERSON, LLP**  
155 MONTGOMERY STREET, SUITE 900  
SAN FRANCISCO, CA 94104  
Telephone: 415-986-1400  
jennie@andrusanderson.com

Liaison Counsel

EMILY C. JEFFCOTT  
**MORGAN & MORGAN**  
633 WEST FIFTH STREET, SUITE 2652  
LOS ANGELES, CA 90071  
Telephone: 213-787-8590  
ejeffcott@forthepeople.com

JOSEPH VANZANDT  
**BEASLEY ALLEN**



234 COMMERCE STREET  
MONTGOMERY, LA 36103  
Telephone: 334-269-2343  
joseph.vanzandt@beasleyallen.com

Federal/State Liaisons

MATTHEW BERGMAN  
GLENN DRAPER  
**SOCIAL MEDIA VICTIMS LAW CENTER**  
821 SECOND AVENUE, SUITE 2100  
SEATTLE, WA 98104  
Telephone: 206-741-4862  
matt@socialmediavictims.org  
glenn@socialmediavictims.org

JAMES J. BILSBORROW  
**WEITZ & LUXENBERG, PC**  
700 BROADWAY  
NEW YORK, NY 10003  
Telephone: 212-558-5500  
jbilsborrow@weitzlux.com

JAYNE CONROY  
**SIMMONS HANLY CONROY, LLC**  
112 MADISON AVE, 7TH FLOOR  
NEW YORK, NY 10016  
Telephone: 917-882-5522  
jconroy@simmonsfirm.com

ANDRE MURA  
**GIBBS LAW GROUP, LLP**  
1111 BROADWAY, SUITE 2100  
OAKLAND, CA 94607  
Telephone: 510-350-9717  
amm@classlawgroup.com

ALEXANDRA WALSH  
**WALSH LAW**  
1050 Connecticut Ave, NW, Suite 500  
Washington D.C. 20036  
Telephone: 202-780-3014  
awalsh@alexwalshlaw.com

MICHAEL M. WEINKOWITZ  
**LEVIN SEDRAN & BERMAN, LLP**  
510 WALNUT STREET  
SUITE 500

PHILADELPHIA, PA 19106  
Telephone: 215-592-1500  
mweinkowitz@lfsbalw.com

Plaintiffs' Steering Committee Leadership

RON AUSTIN  
**RON AUSTIN LAW**  
400 MANHATTAN BLVD.  
HARVEY, LA 70058  
Telephone: 504-227-8100  
raustin@ronaustinlaw.com

PAIGE BOLDT  
**WALSH LAW**  
4 Dominion Drive, Bldg. 3, Suite 100  
San Antonio, TX 78257  
Telephone: 210-448-0500  
PBoldt@alexwalshlaw.com

THOMAS P. CARTMELL  
**WAGSTAFF & CARTMELL LLP**  
4740 Grand Avenue, Suite 300  
Kansas City, MO 64112  
Telephone: 816-701-1100  
tcartmell@wcllp.com

SARAH EMERY  
**HENDY JOHNSON VAUGHN EMERY PSC**  
600 WEST MAIN STREET, SUITE 100  
LOUISVILLE, KT 40202  
Telephone: 859-600-6725  
semery@justicestartshere.com

CARRIE GOLDBERG  
**C.A. GOLDBERG, PLLC**  
16 Court St.  
Brooklyn, NY 11241  
Telephone: 646-666-8908  
carrie@cagoldberglaw.com

RONALD E. JOHNSON, JR.  
**HENDY JOHNSON VAUGHN EMERY PSC**  
600 WEST MAIN STREET, SUITE 100  
LOUISVILLE, KT 40202  
Telephone: 859-578-4444  
rjohnson@justicestartshere.com

SIN-TING MARY LIU  
**AYLSTOCK WITKIN KREIS &  
OVERHOLTZ, PLLC**  
17 EAST MAIN STREET, SUITE 200  
PENSACOLA, FL 32502  
Telephone: 510-698-9566  
mliu@awkolaw.com

JAMES MARSH  
**MARSH LAW FIRM PLLC**  
31 HUDSON YARDS, 11TH FLOOR  
NEW YORK, NY 10001-2170  
Telephone: 212-372-3030  
jamesmarsh@marshlaw.com

JOSEPH E. MELTER  
**KESSLER TOPAZ MELTZER & CHECK LLP**  
280 KING OF PRUSSIA ROAD  
RADNOR, PA 19087  
Telephone: 610-667-7706  
jmeltzer@ktmc.com

HILLARY NAPPI  
**HACH & ROSE LLP**  
112 Madison Avenue, 10th Floor  
New York, New York 10016  
Telephone: 212-213-8311  
hnappi@hrsclaw.com

EMMIE PAULOS  
**LEVIN PAPANTONIO RAFFERTY**  
316 SOUTH BAYLEN STREET, SUITE 600  
PENSACOLA, FL 32502  
Telephone: 850-435-7107  
epaulos@levinlaw.com

RUTH THI RIZKALLA  
**THE CARLSON LAW FIRM, PC**  
1500 ROSECRANS AVE., STE. 500  
MANHATTAN BEACH, CA 90266  
Telephone: 415-308-1915  
rrizkalla@carlsonattorneys.com

ROLAND TELLIS  
DAVID FERNANDES  
**BARON & BUDD, P.C.**  
15910 Ventura Boulevard, Suite 1600  
Encino, CA 91436

Telephone: 818-839-2333  
rtellis@baronbudd.com  
dfernandes@baronbudd.com

MELISSA YEATES  
**KESSLER TOPAZ MELTZER & CHECK LLP**  
280 KING OF PRUSSIA ROAD  
RADNOR, PA 19087  
Telephone: 610-667-7706  
myeates@ktmc.com

DIANDRA “FU” DEBROSSE ZIMMERMANN  
**DICELLO LEVITT**  
505 20th St North  
Suite 1500  
Birmingham, Alabama 35203  
Telephone: 205-855-5700  
fu@dicellolevitt.com

Plaintiffs’ Steering Committee Membership

*Attorneys for Individual Plaintiffs*

**PHILIP J. WEISER**

Attorney General  
State of Colorado

/s/ Bianca E. Miyata

Bianca E. Miyata, CO Reg. No. 42012,  
*pro hac vice*  
Senior Assistant Attorney General  
Lauren M. Dickey, CO Reg. No. 45773, *pro hac vice*  
First Assistant Attorney General  
Elizabeth Orem, CO Reg. No. 58309  
Assistant Attorney General  
Colorado Department of Law  
Ralph L. Carr Judicial Center  
Consumer Protection Section  
1300 Broadway, 7th Floor  
Denver, CO 80203  
Phone: (720) 508-6651  
bianca.miyata@coag.gov

*Attorneys for Plaintiff State of Colorado, ex rel.  
Philip J. Weiser, Attorney General*

**ROB BONTA**

Attorney General  
State of California

/s/ Megan O'Neill

Nicklas A. Akers (CA SBN 211222)  
Senior Assistant Attorney General  
Bernard Eskandari (SBN 244395)  
Emily Kalanithi (SBN 256972)  
Supervising Deputy Attorneys General  
Nayha Arora (CA SBN 350467)  
Megan O'Neill (CA SBN 343535)  
Joshua Olszewski-Jubelirer (CA SBN 336428)  
Marissa Roy (CA SBN 318773)  
Brendan Ruddy (CA SBN 297896)  
Deputy Attorneys General  
California Department of Justice  
Office of the Attorney General  
455 Golden Gate Ave., Suite 11000  
San Francisco, CA 94102-7004  
Phone: (415) 510-4400  
Fax: (415) 703-5480  
Megan.Oneill@doj.ca.gov

*Attorneys for Plaintiff the People of the State of California*

**RUSSELL COLEMAN**

Attorney General  
Commonwealth of Kentucky

/s/ Daniel Keiser

J. Christian Lewis (KY Bar No. 87109),

*Pro hac vice*

Philip Heleringer (KY Bar No. 96748),

*Pro hac vice*

Zachary Richards (KY Bar No. 99209),

*Pro hac vice*

Daniel I. Keiser (KY Bar No. 100264),

*Pro hac vice*

Matthew Cocanougher (KY Bar No. 94292),

*Pro hac vice*

Assistant Attorneys General

1024 Capital Center Drive, Suite 200

Frankfort, KY 40601

CHRISTIAN.LEWIS@KY.GOV

PHILIP.HELERINGER@KY.GOV

ZACH.RICHARDS@KY.GOV

DANIEL.KEISER@KY.GOV

MATTHEW.COCANOUGH@KY.GOV

Phone: (502) 696-5300

Fax: (502) 564-2698

*Attorneys for Plaintiff the Commonwealth of Kentucky*

**MATTHEW J. PLATKIN**

Attorney General  
State of New Jersey

/s/ Thomas Huynh

Kashif T. Chand (NJ Bar No. 016752008),

*Pro hac vice*

Section Chief, Deputy Attorney General

Thomas Huynh (NJ Bar No. 200942017),

*Pro hac vice*

Assistant Section Chief, Deputy Attorney General

Verna J. Pradaxay (NJ Bar No. 335822021),

*Pro hac vice*

Mandy K. Wang (NJ Bar No. 373452021),

*Pro hac vice*

Deputy Attorneys General

New Jersey Office of the Attorney General,  
Division of Law  
124 Halsey Street, 5th Floor  
Newark, NJ 07101  
Tel: (973) 648-2052  
Kashif.Chand@law.njoag.gov  
Thomas.Huynh@law.njoag.gov  
Verna.Pradaxay@law.njoag.gov  
Mandy.Wang@law.njoag.gov

*Attorneys for Plaintiffs New Jersey Attorney General  
and the New Jersey Division of Consumer Affairs  
Matthew J. Platkin, Attorney General for the State of  
New Jersey, and Cari Fais, Acting Director of the New  
Jersey Division of Consumer Affairs*

COVINGTON & BURLING LLP

By: /s/ Ashley M. Simonsen  
Ashley M. Simonsen, SBN 275203  
COVINGTON & BURLING LLP  
1999 Avenue of the Stars  
Los Angeles, CA 90067  
Telephone: (424) 332-4800  
Facsimile: + 1 (424) 332-4749  
Email: [asimonsen@cov.com](mailto:asimonsen@cov.com)

Phyllis A. Jones, *pro hac vice*  
Paul W. Schmidt, *pro hac vice*  
COVINGTON & BURLING LLP  
One City Center  
850 Tenth Street, NW  
Washington, DC 20001-4956  
Telephone: + 1 (202) 662-6000  
Facsimile: + 1 (202) 662-6291  
Email: [pajones@cov.com](mailto:pajones@cov.com)

*Attorney for Defendants Meta Platforms, Inc.  
f/k/a Facebook, Inc.; Facebook Holdings,  
LLC; Facebook Operations, LLC; Facebook  
Payments, Inc.; Facebook Technologies, LLC;  
Instagram, LLC; Siculus, Inc.; and Mark Elliot  
Zuckerberg*

KING & SPALDING LLP

By: /s/ Geoffrey M. Drake  
Geoffrey M. Drake, *pro hac vice*  
TaCara D. Harris, *pro hac vice*  
1180 Peachtree Street, NE, Suite 1600  
Atlanta, GA 30309-3521  
Telephone: (404) 572-4600  
Facsimile: (404) 572-5100  
Email: [gdrake@kslaw.com](mailto:gdrake@kslaw.com)  
[tharris@kslaw.com](mailto:tharris@kslaw.com)

Kristen R. Fournier, *pro hac vice*  
KING & SPALDING LLP  
1185 Avenue of the Americas, 34th Floor  
New York, NY 10036-2601  
Telephone: (212) 556-2100  
Facsimile: (212) 556-2222  
Email: [kfournier@kslaw.com](mailto:kfournier@kslaw.com)  
David P. Mattern, *pro hac vice*



1 KING & SPALDING LLP  
2 1700 Pennsylvania Avenue, NW, Suite 900  
3 Washington, DC 20006-4707  
4 Telephone: (202) 737-0500  
5 Facsimile: (202) 626-3737  
6 Email: dmattern@kslaw.com

7 Bailey J. Langner (SBN 307753)  
8 KING & SPALDING LLP  
9 50 California Street, Suite 3300  
10 San Francisco, CA 94111  
11 Telephone: (415) 318-1200  
12 Facsimile: (415) 318-1300  
13 Email: blangner@kslaw.com

14 Andrea Roberts Pierson, *pro hac vice*  
15 FAEGRE DRINKER LLP  
16 300 N. Meridian Street, Suite 2500  
17 Indianapolis, IN 46204  
18 Telephone: + 1 (317) 237-0300  
19 Facsimile: + 1 (317) 237-1000  
20 Email: andrea.pierson@faegredrinker.com

21 Amy R. Fiterman, *pro hac vice*  
22 FAEGRE DRINKER LLP  
23 2200 Wells Fargo Center  
24 90 South Seventh Street  
25 Minneapolis, MN 55402  
26 Telephone: +1 (612) 766-7768  
27 Facsimile: +1 (612) 766-1600  
28 Email: amy.fiterman@faegredrinker.com

*Attorneys for Defendants TikTok Inc., ByteDance Inc.,  
TikTok Ltd., ByteDance Ltd., and TikTok LLC*

22 MUNGER, TOLLES & OLSON LLP  
23 By: /s/ Jonathan H. Blavin  
24 Jonathan H. Blavin, SBN 230269  
25 MUNGER, TOLLES & OLSON LLP  
26 560 Mission Street, 27th Floor  
27 San Francisco, CA 94105-3089  
28 Telephone: (415) 512-4000  
Facsimile: (415) 512-4077  
Email: jonathan.blavin@mto.com

Rose L. Ehler (SBN 29652)  
Victoria A. Degtyareva (SBN 284199)

Laura M. Lopez, (SBN 313450)  
Ariel T. Teshuva (SBN 324238)  
MUNGER, TOLLES & OLSON LLP  
350 South Grand Avenue, 50th Floor  
Los Angeles, CA 90071-3426  
Telephone: (213) 683-9100  
Facsimile: (213) 687-3702  
Email: rose.ehler@mto.com  
Email: victoria.degtiareva@mto.com  
Email: Ariel.Teshuva@mto.com

Lauren A. Bell (*pro hac vice forthcoming*)  
MUNGER, TOLLES & OLSON LLP  
601 Massachusetts Ave., NW St.,  
Suite 500 E  
Washington, D.C. 20001-5369  
Telephone: (202) 220-1100  
Facsimile: (202) 220-2300  
Email: lauren.bell@mto.com

*Attorneys for Defendant Snap Inc.*

WILSON SONSINI GOODRICH & ROSATI  
Professional Corporation  
By: /s/ Brian M. Willen  
Brian M. Willen (*pro hac vice*)  
WILSON SONSINI GOODRICH & ROSATI  
1301 Avenue of the Americas, 40th Floor  
New York, New York 10019  
Telephone: (212) 999-5800  
Facsimile: (212) 999-5899  
Email: bwillen@wsgr.com

Lauren Gallo White (SBN 309075)  
Samantha A. Machock (SBN 298852)  
WILSON SONSINI GOODRICH & ROSATI  
One Market Plaza, Spear Tower, Suite 3300  
San Francisco, CA 94105  
Telephone: (415) 947-2000  
Facsimile: (415) 947-2099  
Email: lwhite@wsgr.com  
Email: smachock@wsgr.com

Christopher Chiou (SBN 233587)  
Matthew K. Donohue (SBN 302144)  
WILSON SONSINI GOODRICH & ROSATI  
953 East Third Street, Suite 100  
Los Angeles, CA 90013

Telephone: (323) 210-2900  
Facsimile: (866) 974-7329  
Email: cchiou@wsgr.com  
Email: mdonohue@wsgr.com

*Attorneys for Defendants YouTube, LLC and Google LLC*

WILLIAMS & CONNOLLY LLP  
By: /s/ Joseph G. Petrosinelli  
Joseph G. Petrosinelli (*pro hac vice*)  
jpetrosinelli@wc.com  
Ashley W. Hardin (*pro hac vice*)  
ahardin@wc.com  
680 Maine Avenue, SW  
Washington, DC 20024  
Telephone.: 202-434-5000  
Fax: 202-434-5029

*Attorneys for Defendants YouTube, LLC and Google LLC*

MORGAN, LEWIS & BOCKIUS LLP  
By: /s/ Yarden R. Zwang-Weissman  
Yarden R. Zwang-Weissman (SBN 247111)  
300 South Grand Avenue, 22nd Floor  
Los Angeles, CA 90071-3132  
Tel.: 213.612.7238  
Email: yarden.zwang-weissman@morganlewis.com

Brian Ercole (*pro hac vice*)  
600 Brickell Avenue, Suite 1600  
Miami, FL 33131-3075  
Tel.: 305.415.3416  
Email: brian.ercole@morganlewis.com

Stephanie Schuster (*pro hac vice*)  
1111 Pennsylvania Avenue NW  
NW Washington, DC 20004-2541  
Tel.: 202.373.6595  
Email: stephanie.schuster@morganlewis.com

*Attorneys for Defendants YouTube, LLC and Google LLC*

**ATTESTATION**

I, Megan O'Neill, hereby attest, pursuant to N.D. Cal. Civil L.R. 5-1, that the concurrence to the filing of this document has been obtained from each signatory hereto.

Dated: November 15, 2024

By: /s/ Megan O'Neill